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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER

Plaintiff

v.

JOSHUA MOON ET AL,

Defendants

**PLAINTIFF'S RESPONSE
TO JOSHUA MOON'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

Case No.: 2:24-cv-00421-DBB-JCB

Plaintiff Russell Greer responds to Defendants' First Request for Production of Documents and says:

INTRODUCTION

On 11-20-24, Defendants requested, "*Please produce any and all pleadings, filings, or other documents which have been made a part of the record or otherwise appear on the docket in any state, local, or federal court, or in any other forum of dispute resolution or relating to or in any way concerning a case or proceeding in which you are a party, regardless of whether such case is criminal or civil in nature and regardless of the current status or outcome of such case.*"

Plaintiff replies and says that he **objects in whole** because he cannot produce these documents because (1) the request is irrelevant, (2) the time to compile every document would be an undue burden and (3) any civil or criminal case is public information that Defendants have access to and thus they have not demonstrated why they can't get the documents themselves.

1. Other Civil and Criminal Cases are Irrelevant

This is a case about Defendants infringing upon Plaintiffs' copyrights. The 10th Circuit in the appeal of this case stated that Plaintiff stated a "plausible claim" and reversed the dismissal.

Plaintiff is aware that Defendants are trying to paint Joshua Moon as a poor victim, who they are portraying as having done nothing wrong and are trying to tie into past things in Plaintiff's life to show that Moon is somehow a victim of alleged frivolous behavior.

Since the 10th Circuit ruled Greer stated a case, it proves that Defendants' argument is flawed because the panel of 3 judges agreed Greer stated a case for contributory copyright infringement by ruling 3-0 against Moon, thus proving the current case is not frivolous.

Any past case is irrelevant because Joshua Moon is clearly not a victim. In fact, the opposite is true. Defendants have mercilessly stalked Plaintiff and if plaintiff were to go and hand over PUBLIC filings that Plaintiff has made in other cases, some of those filings directly references

kiwi farms (one filing is the case of *Greer v. Stallone* in the 8th Judicial District Court of Nevada, who was apparently using Kiwi Farms to spread defamation about Plaintiff). So not only is the request irrelevant, but providing filings won't help Defendants the way they hope for.

2. Undue Burden

To retrieve all documents, Plaintiff would have to login to PACER (for federal cases) and statewide databases. The amount of time this would take would be an undue burden. Since the cases are irrelevant, it is an undue amount of time to conduct a fishing expedition.

Further, downloading PDFs costs money.

3 . Public Information

Lastly, Defendants have an attorney, who has access to these same databases that are very public. It makes no sense to hand over public documents that Defendants can access.

Conclusion

Plaintiff objects in whole to production request #1 because it's irrelevant, it would cost time and money and the documents are very public.

Respectfully

DATED: December 29th, 2024

Russell Greer

/rgreer/

Pro Se

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on December 29th, 2024, I served a true and correct copy of the attached document by email to all attorneys on record